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*Attorneys for Plaintiffs Hollywood Citizen News  
Operating Company, LLC and Hollywood Citizen  
News F&B, LLC*

**DISTRICT COURT**

**CLARK COUNTY, NEVADA**

HOLLYWOOD CITIZEN NEWS  
OPERATING COMPANY, LLC, and  
HOLLYWOOD CITIZEN NEWS F&B, LLC,

Plaintiffs,

v.

TEN FIVE HOSPITALITY LLC, and DAN  
DALEY,

Defendants.

CASE NO.: 2:23-cv-01126-APG-DJA

**STIPULATION TO EXTEND  
DEADLINES FOR FILING OF  
OPPOSITION AND REPLY ON  
DEFENDANTS' MOTION TO STAY  
OR DISMISS PROCEEDINGS [ECF  
NOS. 26 AND 29] AND REPLY IN  
SUPPORT OF MOTION FOR  
PRELIMINARY INJUNCTION AND  
LEAVE TO IMMEDIATELY  
COMMENCE DISCOVERY [ECF NOS.  
3 AND 4]**

**(SECOND REQUEST)**

1  
2 Plaintiffs Hollywood Citizen News Operating Company, LLC and Hollywood Citizen  
3 News F&B, LLC (collectively, "Plaintiffs") and Defendants Ten Five Hospitality LLC and Dan  
4 Daley (collectively, "Defendants" and, together with Plaintiffs, the "Parties"), by and through  
5 their undersigned counsel, for good cause shown, hereby stipulate and agree to extend Plaintiffs'  
6 deadline to file their opposition to Defendants' Motion to Stay or Dismiss Proceedings [ECF  
7 Nos. 26 and 29] (the "Motion to Dismiss") from September 1, 2023, to September 8, 2023, to  
8 extend Plaintiffs' deadline to file their reply in support of Plaintiff's Motion for Preliminary  
9 Injunction and Leave to Immediately Commence Discovery [ECF Nos. 3 and 4] (the "PI  
10 Motion") from September 1, 2023, to September 8, 2023, and to extend Defendants' reply  
11 deadline relative to the Motion to Dismiss to September 22, 2023, for the following reasons:

12 1. Plaintiffs served the Complaint and the PI Motion on July 24, 2023.

13 2. The Parties previously requested an extension of Defendants' deadline to file their  
14 responsive pleading to the Complaint and their opposition to the PI Motion, which was granted  
15 by the Court on August 3, 2023. *See* ECF No. 18.

16 3. Defendants filed and served their Motion to Dismiss, and the Declaration and  
17 Exhibits in support thereof, on August 18, 2023.

18 4. Defendants filed and served their opposition to the PI Motion and the  
19 Declarations and Exhibits in support thereof, opposing the request for a preliminary injunction  
20 and the request for leave to immediately serve discovery, on August 18, 2023.

21 5. Plaintiffs' opposition to the Motion to Dismiss and reply in support of the PI  
22 Motion are both currently due on September 1, 2023.

23 6. The Motion to Dismiss and the PI Motion present complex and interrelated legal  
24 and factual issues concerning multiple disputes between the Parties, warranting an extension of  
25 time for Plaintiffs' opposition to the Motion to Dismiss and reply in support of the PI Motion.

26 7. The complexity of these legal and factual issues likewise warrants a one-week  
27 extension of time for Defendants' reply in further support of their Motion to Dismiss.  
28

8. These extensions are sought and agreed to in good faith and are not made for the purpose of delay.

9. THEREFORE, the Parties respectfully request an extension of the deadline for Plaintiffs to file their opposition to the Motion to Dismiss from September 1, 2023 to and including September 8, 2023, for Plaintiffs to file their reply in support of the PI Motion from September 1, 2023 to and including September 8, 2023, and of Defendants' reply deadline relative to the Motion to Dismiss to September 22, 2023.

**THE PARTIES SO STIPULATE**

Dated this 25<sup>th</sup> August 2023.

Dated this 25<sup>th</sup> August 2023.

GARMAN TURNER GORDON LLP

SNELL & WILMER L.L.P.

/s/ Dylan T. Ciciliano

/s/ V.R. Bohman

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**ORDER**

**IT IS SO ORDERED.**

DATED this 28th day of August 2023.

  
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ANDREW P. GORDON  
UNITED STATES DISTRICT JUDGE